EXHIBIT B

A NEW KIND OF LAW FIRM.

Todd E. Duffy tduffy@duffyamedeo.com (212) 729-5832

VIA E-MAIL ONLY

May 20, 2016

Geoffrey A. North, Esq. Baker & Hostetler, LLP 45 Rockefeller Center, 11th Floor New York, NY 10111

RE: Bernard L. Madoff Investment Securities LLC

Chapter 7 SIPA Liquidation No. 08-01789 (BRL)

Picard v. Alpha Prime Fund Ltd. et al.

Adversary Proceeding No. 09-01364 (BRL)

Dear Geoff:

I am writing in response to your letter dated May 19, 2016. Initially, please note Alpha Prime Fund has not only produced all documents in its custody and control that are responsive to the Trustee's Requests, but it has turned over every single document in its files. It has withheld nothing. Thus, with respect to the requests where there are no responses, Alpha Prime has no objection to the Request and has produced all documents in its file.

With respect to your request for clarification relating to HSBC, while it would be impossible for us to know what is in HSBC's files, if HSBC has responsive documents at all, Alpha Prime believes that HSBC would only have additional documents relating to the Trustee's Requests numbered 28, 45, 46, 49, 58 and 61. With respect to the remaining Requests, Alpha Prime believes that its files are complete and it has fully and completely responded to the Trustee's Requests.

Please feel free to contact me if you have any questions.

Sincerely,

Todd E. Duffy

cc: Douglas A. Amedeo, Esq. (via e-mail only)

Christian Hausmaninger, Esq. (via e-mail only)

Oren Warshavski, Esq. (via e-mail only)

Dominic Gentile, Esq. (via e-mail only)

Tatiana Markel, Esq. (via e-mail only)